

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Clearview AI, Inc.,

Petitioner/Plaintiff

v.

DECLARATION OF JOHN P. DEAN

Investigative Consultants, Inc.

and

Case No. 1:25-cv-00049

Donald Berlin,

Respondents/Defendants

John P. Dean deposes and states the following under oath:

1. I am over eighteen years of age and of sound mind, am counsel to Investigative Consultants, Inc. (“ICI”) and Donald M. Berlin (together “Respondents/Defendants”). I am competent to testify to the facts set forth herein and, if called as a witness and placed under oath, would so testify.

2. Exhibit 1 to the Reply Memorandum filed this day is a true and correct copy of Claimant Clearview, AI’s request for leave to file a motion to dismiss Respondent’s Counterclaim, filed in the arbitration on September 14, 2023.

3. Exhibit 2 to the Reply Memorandum filed this day is a true and correct copy of Claimant Clearview, AI’s revised request for leave to file a motion to dismiss Respondent’s Counterclaim, filed in the arbitration on September 26, 2023.

4. Exhibit 3 to the Reply Memorandum filed today is a true and correct copy of Respondent Donald Berlin’s motion to be dismissed from the proceedings, filed in the arbitration on November 13, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

January 30, 2025

/s/ John P. Dean
John P. Dean